

**United States Bankruptcy Court
Middle District of Pennsylvania**

In re:

Roger Dale Moore,
Barbara Ann Moore,

Debtors.

Case No. 1:22-bk-02406-HWV

Chapter 13

Debtors' Amended Motion to Modify Confirmed Chapter 13 Plan

AND NOW, Debtors Roger Dale Moore and Barbara Ann Moore, by and through their attorney, move this Court to modify their confirmed chapter 13 plan. In support of this motion, the Debtors states as follows:

1. The Debtors filed this case under chapter 13 on December 14, 2022.
2. The plan was confirmed on April 27, 2023.
3. The Debtors ask the Court to approve the Fifth Amended Plan, which is attached to this motion.
4. The proposed plan provides for payment of post-petition mortgage arrearages to U.S. Bank Trust National Association pursuant to stipulation of the parties filed as ECF No. 53.

NOW, THEREFORE, the Debtors ask this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: November 27, 2023

CIBIK LAW, P.C.
Counsel for Debtors

By: /s/ Michael I. Assad
Michael I. Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com